UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

GENERAL ELECTRIC COMPANY,)
Plaintiff,)
v.) Civil Action No. 08-591-TSE/JF
ADRIANA KOECK,)
Defendant.))

EMERGENCY JOINT MOTION TO STAY PROCEEDINGS

Plaintiff General Electric Company and defendant Adriana Koeck jointly move the Court, on an emergency basis, for a stay of proceedings for a period of 14 days. The grounds for the motion are fully set forth in the accompanying memorandum.

Respectfully submitted,

/s/

Robert B. Nealon Virginia Bar No. 23096

Jay I. Igiel

Virginia Bar No. 65576

Michael T. Pritchard

Virginia Bar No. 65846 Attorneys for Adriana Koeck

NEALON & ASSOCIATES, P.C.

119 N. Henry Street

Alexandria, VA 22314

(703) 684-5755

(703) 684-0153 (fax)

rbnealon@nealon.com

jigiel@nealon.com

mpritchard@nealon.com

/s/

Charles B. Wayne

Virginia Bar No. 24954

Elisha A. King

Attorneys for General Electric Company

DLA PIPER LLP (US)
500 8th Street N.W.

500 8th Street, N.W.

Washington, D.C. 20004

(202) 799-4000

(202) 799-5000 (fax)

charles.wayne@dlapiper.com

/s/

Grant E. Morris
Virginia Bar No. 16260
LAW OFFICES OF GRANT MORRIS
1666 Connecticut Avenue, N.W.
Suite 310
Washington, D.C. 20009
(202) 742-7783
(202) 742-7776 (fax)
grantemorris@gmail.com

David W. Sanford
Stefanie F. Roemer
SANFORD, WITTELS & HEISLER, LLP
1666 Connecticut Avenue, N.W.,
Suite 310
Washington, D.C. 20009
(202) 742-7777
(202) 742-7776 (fax)
dsanford@nydclaw.com
sroemer@nydclaw.com

Of Counsel:

MORGAN, LEWIS & BOCKIUS LLP

Barbara Van Gelder 1111 Pennsylvania Avenue, N.W. Washington, D.C. 20004 (202) 739-5256 (202) 739-3001 (fax)

Sarah E. Bouchard Anne E. Martinez 1701 Market Street Philadelphia, PA 19103 (215) 963-5077/5718 (215) 963-5001 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

Grant E. Morris Law Offices of Grant Morris 1666 Connecticut Avenue, N.W. Suite 310 Washington, D.C. 20009

Robert B. Nealon Michael T. Pritchard Jay I. Igiel Nealon & Associates, PC 119 N. Henry Street Alexandria, VA 22314

David W. Sanford Stefanie F. Roemer Sanford, Wittels & Heisler, LLP 1666 Connecticut Avenue, N.W. Suite 310 Washington, D.C. 20009

<u>/s</u>/

Charles B. Wayne
Virginia Bar No. 24954
Elisha A. King
Attorneys for General Electric Company
DLA PIPER LLP (US)
500 8th Street, N.W.
Washington, D.C. 20004
(202) 799-4000
(202) 799-5000 (fax)
charles.wayne@dlapiper.com